IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

THE TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK,

Plaintiff

v.

Civil Action No. 3:13-cv-00808-MHL

NORTONLIFELOCK INC.,

Defendant

NORTONLIFELOCK'S MOTIONS IN LIMINE

Defendant NortonLifeLock Inc. ("Norton") respectfully moves in limine to exclude certain evidence at trial. Specifically, Norton requests that the Court exclude: (i) the amount Broadcom paid for Norton's Enterprise business and the value of a loan secured by Norton's patents; (ii) arguments, evidence, or reference to alleged copying by Norton; (iii) untimely evidence concerning willfulness; (iv) Columbia did not disclose during discovery; (v) comments and arguments regarding Marc Dacier's absence from trial; (vi) evidence regarding out-of-court conversations with Marc Dacier; and (vii) reference to the Inter Partes Review proceedings concerning the asserted patents.

The grounds for these motions *in limine* are set forth in Norton's Memorandum in Support, which is filed herewith.

February 28, 2022

NORTONLIFELOCK INC.

By: /s/ Of Counsel Dabney J. Carr, IV, VSB #28679 TROUTMAN PEPPER HAMILTON SANDERS LLP P. O. Box 1122 Richmond, Virginia 23218-1122

Telephone: (804) 697-1200 Facsimile: (804) 697-1339

dabney.carr@troutmansanders.com

David A. Nelson (*pro hac vice*) davenelson@quinnemanuel.com
Stephen A. Swedlow (*pro hac vice*) stephenswedlow@quinnemanuel.com
Nathan Hamstra (*pro hac vice*)
nathanhamstra@quinnemanuel.com
191 N. Upper Wacker, Suite 2700
Chicago, Illinois 60606
Telephone: (312) 705-7400
Facsimile: (312) 705-7401

QUINN EMANUEL URQUHART &

SULLIVAN LLP

Nina Tallon (*pro hac vice*) ninatallon@quinnemanuel.com 1300 I Street NW, Suite 900 Washington, DC 20005 Telephone: (703) 967-9395 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Richard Erwine (*pro hac vice*) richarderwine@quinnemanuel.com 51 Madison Ave, 22nd Floor New York, NY 10010 Telephone: (212) 849-7135

Facsimile: (212) 849-7100

ATTORNEYS FOR DEFENDANT NORTONLIFELOCK INC.